

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

UNITED STATES OF AMERICA)	
)	No. 1:23-cr-
v.)	
)	
AMY BURLEY)	
)	
Defendant.)	
)	
)	

INFORMATION

The United States Attorney charges:

COUNT ONE
Theft From Program Receiving Federal Funds
[18 U.S.C. § 666(a)(1)(A)]

AT ALL TIMES MATERIAL TO COUNT ONE OF THIS INFORMATION:

1. Barnstead School District was a school district encompassing the Town of Barnstead in New Hampshire and included Barnstead Elementary School, offering classes to more than 400 students from kindergarten to grade 8.
2. Barnstead School District was the recipient of benefits under a Federal program, including annual grants. Among the grants received by Barnstead School District were Title I grants, Special Education grants, Special Education Preschool grants, 21st Century Community Learning Centers grants, and Improving Teacher Quality grants, all from the United States Department of Education. In each of the years 2013 through 2020, Barnstead School District received benefits from the Department of Education pursuant to these grants in excess of \$10,000.
3. Amy Burley was employed by Barnstead School District as a bookkeeper. In that

capacity, she was responsible for processing payroll, which included entering rates of pay, benefit information, and employee banking information. Burley also had the ability to submit invoices, enter vendor information, and make entries in the general ledger.

THEFT FROM PROGRAM RECEIVING FEDERAL FUNDS

4. From about July 2013 through about September 2019, in the District of New Hampshire, the defendant,

AMY BURLEY,

being an agent of Barnstead School District, said School District receiving in each of the years 2013 through 2020, benefits in excess of \$10,000 under United States Department of Education grants, embezzled, stole, obtained by fraud, without authority knowingly converted to her own use, and intentionally misapplied property worth at least \$5,000 and was owned by, and was under the custody, care, and control of Barnstead School District, that is, \$110,295.26 in payments for unauthorized payroll benefits, student loan payments made for the benefit of the defendant's family, payments made to the defendant's personal creditors, payments made to an Amazon.com account used for the defendant's personal benefit, and other payments made for the benefit of the defendant.

All in violation of Title 18 United States Code Section 666(a)(1)(A).

COUNT TWO

**Theft From Program Receiving Federal Funds
[18 U.S.C. § 666(a)(1)(A)]**

AT ALL TIMES MATERIAL TO COUNT ONE OF THIS INFORMATION:

5. Hampton School District was a school district encompassing the Town of Hampton in New Hampshire and included Adeline C. Marston School, Hampton Academy, and Hampton Centre School, offering classes to more than 1000 students from preschool to grade 8.

6. Hampton School District was the recipient of benefits under a Federal program, including annual grants. Among the grants received by Hampton were Education Stabilization Fund Grants from the United States Department of Education. In the year 2020, Hampton School District received benefits from the United States Department of Education pursuant to these grants in excess of \$10,000.

7. Amy Burley was employed by Hampton School District as a bookkeeper. In that capacity, she had access to the bank reconciliations, the general ledger, and could access direct deposits and payments from Hampton School District's bank account.

THEFT FROM PROGRAM RECEIVING FEDERAL FUNDS

8. From about August 2020 through about September 2020, in the District of New Hampshire, the defendant,

AMY BURLEY,

being an agent of Hampton School District, said School District receiving in the year 2020, benefits in excess of \$10,000 under United States Department of Education grants, embezzled, stole, obtained by fraud, without authority knowingly converted to her own use, and intentionally misapplied property worth at least \$5,000 and was owned by, and was under the custody, care, and control of Hampton, that is, \$20,966.52 in payments to her own creditors and student loans belonging to her family members.

All in violation of Title 18 United States Code Section 666(a)(1)(A).

JANE E. YOUNG
United States Attorney

January 17, 2023

By: /s/ John J. Kennedy
John J. Kennedy
Assistant United States Attorney